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VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

**Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP
Response to Supplemental Filing re Discovery Disputes (ECF No. 400)**

Your Honor:

Defendant Alan Dershowitz (“Prof. Dershowitz”) respectfully submits this response to Plaintiff’s Supplemental Filing re: Discovery Disputes (ECF No. 400).

As noted in Plaintiff’s letter, Plaintiff requested the production in this action of all documents which Prof. Dershowitz has produced in his lawsuit against CNN which support his claim for damages in that action. As reflected in Exhibit A to Plaintiff’s letter, Prof. Dershowitz objected to producing documents in response to this request because Plaintiff refused to provide closely related discovery into other causes of harm to her own reputation, and in particular, concerning her involvement in recruiting other girls for Jeffrey Epstein – conduct which according to her own definition makes her a co-conspirator in Epstein’s trafficking ring rather than a victim. *See* ECF No. 397. Now that the Court has ruled that Plaintiff’s role in recruiting other girls is a proper subject of discovery in this action and ordered Plaintiff to respond to requests for admission concerning that topic, *see* ECF No. 401 at p. 8, Prof. Dershowitz has no objection to producing documents which he is relying upon to support his damages claim in the CNN action.

In an effort to avoid further motion practice on issues relating to damages, Prof. Dershowitz asks the Court to clarify, consistent with its recent order, *see* ECF No. 401 at p. 6, that Plaintiff shall be required to produce documents sufficient to disclose all details of her settlements with Prince Andrew and the Estate of Jeffrey Epstein, including the amounts of those settlements.

Respectfully submitted,

/s/ Christian G. Kiely
Christian G. Kiely

cc: All counsel of record, via ECF